

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ANDREW HINESLEY,

Plaintiff,

v.

GRAY TELEVISION, INC., d/b/a HAWAII NEWS
NOW,

Defendant.

No. 1:25-CV-11488

PLAINTIFF’S RESPONSE TO DEFENDANT’S NOTICE (DKT.30)

Plaintiff files this response to clarify procedural defects in Defendant’s Notice (Dkt. 30) and to protect the integrity of the sealing process already before the Court.

Defendant’s Notice (Dkt. 30) seeks unsealing without a motion, in violation of Fed. R. Civ. P. 7(b)(1). It also lacks the required conferral certification under Local Rule 7.1(a)(2) and omits the memorandum of reasons required by Local Rule 7.1(b)(1). If Defendant intends to challenge impoundment, Local Rule 7.2 requires a motion with specific legal and factual justification. None was filed.

Plaintiff’s Renewed Motion to Seal (initially filed at Dkt. 25 on June 12, and refiled nunc pro tunc at Dkt. 34 on June 16, with a corrected notice at Dkt. 33) is substantively identical to the withdrawn version. Defendant’s reference to a “revoked agreement” is incorrect.

Plaintiff respectfully asks the Court to take no action on Dkt. 30.

Dated: June 17, 2025

Respectfully submitted,

/s/ Andrew Hinesley

Pro se

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Revere, MA

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of June, 2025, I caused a true and correct copy of the foregoing to be served by email on the following:

Jacquelyn Schell: SchellJ@ballardspahr.com

James Masella III: masellaj@ballardspahr.com

Sasha Dudding: duddings@ballardspahr.com

/s/ Andrew Hinesley

Andrew Hinesley

Pro se